# IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Joseph George

Debtor

SN Servicing Corporation as servicer for U.S. Bank Trust National Association, as

Trustee of Ranch Series III Trust

Movant

v.

Judge: Ashely M. Chan

Chapter: 13

Case No.: 17-14689-amc

Hearing Date: February 14, 2023, at 11:00 A.M.

Joseph George Henry J George- Co-Debtor

Kenneth E. West Trustee
Respondents

## PRAECIPE TO WITHDRAW MOTION FOR RELIEF FROM THE AUTOMATIC STAY

#### TO THE CLERK:

Kindly withdraw the Motion for Relief from the Automatic Stay, Co-Debtor Stay filed SN Servicing Corporation as servicer for U.S. Bank Trust National Association, as Trustee of Ranch Series III Trust on October 25, 2022 at Docket #322, as the loan has been paid in full.

Dated: January 31, 2023

By: \_/s/ Lauren M. Moyer Lauren M. Moyer, Esquire FRIEDMAN VARTOLO LLP Attorneys for Movant 1325 Franklin Avenue, Suite 160 Garden City, New York 11530

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## CERTIFICATE OF SERVICE OF PRAECIPE TO WITHDRAW MOTION FOR RELIEF

I certify under penalty of perjury that I caused to be served the above captioned pleading on the parties at the addresses specified below or on the attached list on January 31, 2023.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: first-class mail and electronic notification

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail, is listed under the heading "Service by First-Class Mail."

EXECUTED ON: January 31, 2023

By: \_/s/ Lauren M. Moyer Lauren M. Moyer, Esquire FRIEDMAN VARTOLO LLP Attorneys for Movant 1325 Franklin Avenue, Suite 160 Garden City, New York 11530 T: (212) 471-5100

F: (212) 471-5150 Bankruptcy@FriedmanVartolo.com

#### SERVICE LIST

## Service by NEF

### Trustee

Kenneth E. West Office of the Chapter 13 Standing Trustee 1234 Market Street - Suite 1813 Philadelphia, PA 19107

## **Debtor's Counsel**

ROBERT NEIL BRAVERMAN McDowell Law, PC 46 West Main Street Maple Shade, NJ 08052

### **Debtor's Counsel**

ROBERT LEITE-YOUNG Law Office Robert Leite-Young 6950 Castor Avenue Philadelphia, PA 19149

### U.S. Trustee

United States Trustee Office of the U.S. Trustee Robert N.C. Nix Federal Building Suite 300 Philadelphia, PA 19107

## **Service by First-Class Mail**

#### Debtor

Joseph George 508 Solly Drive Philadelphia, PA 19136

### **Co-Debtor**

Henry J George 4201 Decatur Street Philadelphia, PA 19149